

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MONTY C. PEPPER,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-084-JJF
)	
Warden THOMAS CARROLL, C/O)	
BAMBI THOMAS, C/O JAMES)	
GARDELS, C/O THOMAS SEACORD)	
)	
Defendants.)	

AFFIDAVIT OF THOMAS SEACORD

I, Thomas Seacord, having been duly sworn according to the law, do hereby depose and state the following:

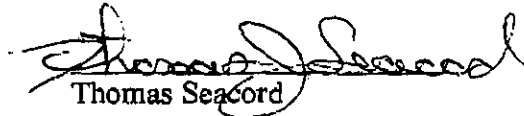
1. I am employed by the State of Delaware, Department of Correction at the Delaware Correctional Center ("DCC") near Smyrna, Delaware as a correction officer. I have been employed by the Department of Correction for 16 years. My duties include area Lieutenant of the Security Housing Unit ("SHU") complex. I have held this position since January, 2003; currently I am a Classification Officer and have held this position since August, 2005.
2. In response to a request from the State of Delaware Department of Justice, I am providing the following information regarding legal call request forms, form number 883.
3. I started working in the SHU in January, 2003. For the entire time I have worked in the SHU, I have not used Form 883, the Legal Call Request form. Inmates who wish to speak to an attorney are instructed to write the attorney's name and phone number on a piece of paper. The inmate then gives the paper with the request to a lead worker, usually a Sergeant, who then forwards the request to the Lieutenants' office. The Lieutenant then calls the attorney to set up a

telephone appointment for the inmate and lawyer.


4. In the years that I have worked in the SHU, I have set up countless attorney phone appointments for inmates who requested the call by using a plain piece of paper to make the request.

5. Under no circumstances have I ever thrown away any legal call request because it was not written on a Legal Call request form.

6. I have made these statements based upon my personal knowledge, specialized training, and experience as an employee of the Department of Correction.


Thomas Seacord

SWORN TO AND SUBSCRIBED BEFORE ME THIS 3 DAY OF March
2006.


NOTARY